

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

TAASERA LICENSING LLC,

Plaintiff,

v.

TREND MICRO, INC.,

Defendant.

Case No. 2:21-CV-0441

JURY TRIAL DEMANDED

**DECLARATION OF HOLLY E. ENGELMANN IN SUPPORT OF
DEFENDANT TREND MICRO (JAPAN) INC.'S
MOTION TO TRANSFER PURSUANT TO 28 U.S.C. §1404(a) FOR TRIAL**

I, Holly E. Engelmann, declare as follows:

1. My name is Holly Engelmann. I am a Partner in the law firm Duane Morris LLP (“Duane Morris”), counsel of record for Trend Micro (Japan) Inc. in this action. I am admitted to practice before this Court and in this matter. I have personal knowledge of the facts herein and, if called as a witness, could and would testify competently as to their truth.

2. Attached hereto as Exhibit 1 is a true and correct copy of Quest’s 2Q 2021 Form 10-Q.

3. Attached hereto as Exhibit 2 is a true and correct copy of Taasera Licensing LLC’s Response in Opposition to Motion for Centralization Pursuant to 28 U.S.C. § 1407 filed as Dkt. 29 on June 10, 2022 under Case MDL No. 3042.

4. Attached hereto as Exhibit 3 is a true and correct copy of Quest Patent Research Corporation’s May 25, 2021 Press Release titled “Acquisition of Taasera Portfolio Completed.”

5. Attached hereto as Exhibit 4 is a true and correct copy of Taasera Licensing LLC's May 12, 2021 Certificate of Formation Limited Liability Company filing with the Secretary of State of Texas.

6. Attached hereto as Exhibit 5 is a true and correct copy of Taasera Licensing LLC's June 1, 2022 Letter to Judge Ramos of the Southern District of Texas regarding Request for Pre-Motion Conference in *Palo Alto Networks, Inc. v. Taasera Licensing LLC and Quest Patent Research Corporation* Case No. 1:22-cv-02306-ER/SDA (S.D.N.Y.).

7. Attached hereto as Exhibit 6 is a true and correct copy of TaaSera's "Contact Us" webpage using the Wayback Machine on July 31, 2022.

8. Attached hereto as Exhibit 7 is a true and correct copy of a Google map for directions from Trend Micro Inc.'s Irving headquarters to the U.S. District Court for the Eastern District of Texas Marshall division courthouse.

9. Attached hereto as Exhibit 8 is a true and correct copy of a Google map for directions from the Dallas-Fort Worth airport to the U.S. District Court for the Eastern District of Texas Marshall division courthouse.

10. Our litigation team at Duane Morris has determined the current or last known addresses for each of the named inventors on each of the patents-in-suit. The determined locations for each inventor are as follows:

Inventor	Patent(s)	Location
Srinivas Kumar	'441, '616, '948	California
Dennis Pollutro	'616	New York
Gurudatt Shashikumar	'441	California
Geoffrey Zweig	'796	Connecticut

Inventor	Patent(s)	Location
Mukund Padmanabhan	'796	New York
Thomas Saterlee	'137	California
William Hackenberger	'137	California
Blair Nicodemus	'038	Greater Philadelphia Area
Billy Stephens	'038	Greater Philadelphia Area

11. Our litigation team at Duane Morris has identified at least nine patents that constitute prior art to the asserted patents in this lawsuit that, based on internet searches performed on May 4, 2022, have named inventors appearing to reside within this judicial district. These patents include:

- U.S. Pat. No. 5,353,393 (cited in asserted U.S. Pat. No. 7,673,137). Named inventor William A. Opincar appears to currently reside in Dallas, Texas, which I understand is within this judicial district.
- U.S. Pat. No. 6,205,552 (cited in asserted U.S. Pat. No. 7,673,137). Named inventor Bob Fudge appears to currently reside in Quinlan, Texas, which I understand is within this judicial district.
- U.S. Pat. No. 6,091,835 (cited in asserted U.S. Pat. No. 8,990,948 and asserted U.S. Pat. No. 9,092,616). Named inventor Benjamin Wright appears to currently reside in Dallas, Texas, which I understand is within this judicial district.
- U.S. Pat. No. 7,178,015. Named inventor Craig W. Warner appears to currently reside in Coppell, Texas, which I understand is within this judicial district. inventor Glen Edwards appears to currently reside in Dallas, Texas, which I understand is within this judicial district.
- U.S. Pat. No. 7,308,712. Named inventor Carl E. Banzhof appears to currently reside in Dallas, Texas, which I understand is within this judicial district.
- U.S. Pat. No. 7,278,163. Named inventor Carl E. Banzhof appears to currently reside in Dallas, Texas, which I understand is within this judicial district. Named inventor John Davies appears to currently reside in Dallas, Texas, which I understand is within this judicial district.

- U.S. Pat. No. 8,819,773. Named inventor Carl E. Banzhof appears to currently reside in Dallas, Texas, which I understand is within this judicial district.
- U.S. Pat. No. 8,881,272. Named inventor David Harris appears to currently reside in Dallas, Texas, which I understand is within this judicial district.

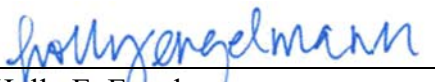
12. Our litigation team at Duane Morris has identified several recent cases in which the Fabricant Law Firm, counsel to Defendant, has sued a foreign defendant in the U.S. District Court for the Eastern District of Texas while declining to name any U.S. entities. The cases identified include, but are not limited to:

- *Northstar Sys. LLC v. NEC Corp.*, EDTX-2:22-cv-00324 (filed Aug. 19, 2022).
- *Northstar Sys. LLC v. Mercedes-Benz Group AG*, EDTX-2:22-cv-00323 (filed Aug. 19, 2022).
- *Northstar Sys. LLC v. Lenovo Group Ltd.*, EDTX-2:22-cv-00267 (filed July 18, 2022).
- *SoundStreak Texas, LLC v. FUJIFILM Holdings Corp.*, EDTX-2:22-cv-00258 (filed July 13, 2022).
- *ServStor Tech. LLC v. NEC Corp.*, EDTX-2:22-cv-00249 (filed Jul. 7, 2022).
- *ServStor Tech. LLC v. Acer, Inc.*, EDTX-2:22-cv-00221 (filed June 20, 2022).
- *Northstar Sys. LLC v. adidas AG*, EDTX-2:22-cv-00154 (filed May 16, 2022).
- *Tyche Licensing LLC v. Infineon Tech. AG*, EDTX-2:22-cv-00147 (filed May 13, 2022).
- *Northstar Sys. LLC v. Honda Motor Co. Ltd.*, EDTX-2:22-cv-00413 (filed May 11, 2022).
- *Longhorn HD LLC v. QNAP Sys. Inc.*, EDTX-2:22-cv-00070 (filed Mar. 7, 2022).
- *Longhorn HD LLC v. Razer Inc.*, EDTX-2:22-cv-00071 (filed Mar. 7, 2022).
- *Apex Beam Tech. LLC v. ZTE Corporation.*, EDTX-2:22-cv-00031 (filed Feb. 1, 2022).
- *Elite Gaming Tech. LLC v. Nordic Semiconductor ASA*, EDTX-2:21-cv-00470 (filed Dec. 28, 2021).

- *Rampart Asset Mgmt. LLC v. Renesas Elec. Corp.*, EDTX-2:21-vc-00466 (filed Dec. 23, 2021).
- *Apex Beam Tech. LLC v. TCT Mobile Int'l Ltd*, EDTX-2:21-cv-00438 (filed Nov. 30, 2021).
- *Multimodal Media LLC v. ZTE Corporation*, EDTX-2-21-cv-00437 (filed Nov. 29, 2021).
- *Audio Messaging Inc. v. ZTE Corporation*, EDTX-2-21-cv-00379 (filed Oct. 8, 2021).
- *SoundStreak Texas, LLC v. Sony Group Corporation*, EDTX-2-21-cv-00359 (filed Sept. 17, 2021).
- *SoundStreak Texas, LLC v. Nikon Corporation*, EDTX 2-21-cv-00362 (filed Sept. 17, 2021).
- *Blitzsafe Texas, LLC v. Aston Martin Lagonda Global Holdings, PLC*, EDTX 2-21-cv-00294 (Filed Aug. 3, 2021).
- *Blitzsafe Texas, LLC v. Harman Becker Automotive Systems GmbH*, EDTX 2-21-cv-00296 (Filed Aug. 3, 2021).
- *Blitzsafe Texas, LLC v. Alps Alpine Co. Ltd.*, EDTX 2-21-cv-00293 (filed Aug. 3, 2021).
- *Blitzsafe Texas, LLC v. Aptiv PLC*, EDTX 2-21-cv-00160 (filed May 12, 2021).
- *Blitzsafe Texas, LLC v. Continental AG*, EDTX 2-21-cv-00161 (filed May 12, 2021).
- *Blitzsafe Texas, LLC v. EinCar Tech., Ltd.*, EDTX 2-21-cv-00162 (filed May 12, 2021).
- *Blitzsafe Texas, LLC v. Jvckenwood Corp.*, EDTX 2-21-cv-00163 (filed May 12, 2021).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 7, 2022.

/s/ 
Holly E. Engelmann